

# EXHIBIT 4

**From:** [Brown, Lucy E. \(ENRD\)](#)  
**To:** [Kristina Hambley](#); [Cirino, Paul \(ENRD\)](#); [Mitchell, David \(ENRD\)](#); [Barbata, Dana \(USAHI\)](#)  
**Cc:** [Daniel Cooper](#); [Phil Gregory](#); [Purpuro, Alexander \(ENRD\)](#)  
**Subject:** RE: [EXTERNAL] Wai Ola v. DoD- DCRIT Designations  
**Date:** Tuesday, April 15, 2025 1:27:59 PM

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Hi Kristina,

We are not prepared to schedule a meet and confer just yet because our agency counsel is out due to a family emergency. To help us advise our clients, can you please explain Plaintiffs' intended use of the documents and how quickly Plaintiffs need them? Are Plaintiffs open to identifying a range of relevant pages for review instead of entire documents? This would help expedite review if, for example, Plaintiffs seek to use the documents in summary judgment briefing. The current list is over 6,800 pages.

Also, as noted in our status report, Defendants plan to move to extend the stay of the RCRA claim for one year. Can we meet and confer on this motion on Thursday?

Thanks,

Lucy E. Brown  
Senior Attorney  
United States Department of Justice  
Environment and Natural Resources Division  
(202) 598-1868

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**From:** Kristina Hambley <kristina@sycamore.law>  
**Sent:** Friday, April 11, 2025 2:33 PM  
**To:** Cirino, Paul (ENRD) <Paul.Cirino@usdoj.gov>; Brown, Lucy E. (ENRD) <Lucy.E.Brown@usdoj.gov>; Mitchell, David (ENRD) <David.Mitchell@usdoj.gov>; Barbata, Dana (USAHI) <Dana.Barbata@usdoj.gov>  
**Cc:** Daniel Cooper <daniel@sycamore.law>; Phil Gregory <pgregory@gregorylawgroup.com>  
**Subject:** [EXTERNAL] Wai Ola v. DoD- DCRIT Designations

Counsel,

Please see the attached. Thank you.

Best,  
Kristina

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SYCAMORE LAW  
Kristina Hambley (she/her)

Associate Attorney

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